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Attorneys for Defendant

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

SARA MALDONADO,

Plaintiff,

v.

COMMISSIONER OF SOCIAL  
SECURITY,

Defendant.

No. 1:24-cv-01263-SKO

STIPULATED MOTION AND ORDER FOR  
AN EXTENSION OF TIME TO RESPOND TO  
PLAINTIFF'S MOTION FOR SUMMARY  
JUDGMENT

(Doc. 15)

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Defendant's time for responding to Plaintiff's Motion for Summary Judgment be extended thirty (30) days from February 18, 2025 to March 20, 2025. This is Defendant's first request for an extension. Counsel for Plaintiff has no objection to Defendant's request for an extension.

Good cause exists for this request. Defendant respectfully requests this additional time because Counsel for Defendant has and will be unable to devote the time required to complete its

1 response. Counsel has multiple merit briefs currently due in district court cases next week.  
2 Counsel for Defendant will be out of the office February 14, 17, 18. Given upcoming leave and  
3 competing workload requirements an extension until March 20, 2025 will provide the opportunity  
4 for the undersigned Counsel for Defendant to prioritize completing the response to Plaintiff's  
5 Motion for Summary Judgment. The undersigned Counsel apologizes to the Court and Plaintiff's  
6 counsel for any inconvenience caused by this request and delay. All other dates in the Court's  
7 Scheduling Order shall be extended accordingly.

8  
9 Respectfully submitted,

10 MICHELE BECKWITH  
11 Acting United States Attorney

12 DATE: February 14, 2025

13 By: s/ Oscar Gonzalez de Llano  
14 OSCAR GONZALEZ DE LLANO  
15 Special Assistant United States Attorney  
16 Attorneys for Defendant

17  
18 Respectfully submitted,

19 DATE: February 14, 2025

20 By: s/ Jonathan Omar Pena  
21 Jonathan Omar Pena  
22 Pena and Bromberg, PC  
23 (\*as authorized by email)  
24 Attorney for Plaintiff  
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26  
27  
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ORDER

Pursuant to the parties' stipulated motion (Doc. 15),

IT IS HEREBY ORDERED that Defendant shall have an extension, up to and including March 20, 2025, to respond to Plaintiff's Motion for Summary Judgment. All other dates in the Scheduling Order (Doc. 5) are enlarged accordingly.

IT IS SO ORDERED.

Dated: February 14, 2025

/s/ Sheila K. Oberto  
UNITED STATES MAGISTRATE JUDGE